

July 7, 2025

VIA ECF

Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *Emilio Garcia v. Roc Nation LLC, et al.*
S.D.N.Y. Case No. 24-cv-07587 (GHW)
DEPOSITION EXCERPTS PER DKT #116

Dear Judge Woods:

Pursuant to the Court's July 2, 2025 Order (Docket No. 116), Plaintiff Emilio Garcia ("Plaintiff") respectfully submits excerpts of the depositions of Defendant Megan Pete, and third-party witness, Jason McMillen, former employee of Rockefeller Capital Management, consistent with those referenced in the joint pre-motion conference letter submitted July 1, 2025 (Docket No. 114):

- Attached hereto as Exhibit "A" are true and correct copies of relevant excerpts of the deposition of Defendant Megan Pete; and
- Attached hereto as Exhibit "B" are true and correct copies of relevant excerpts of the deposition of third-party, Jason McMillen.

Additionally, Plaintiff submits select, pertinent emails produced the afternoon of July 2, 2025, from Defendant ROC Nation after its Chief Financial Officer, Sean Mulvehill, testified on June 30, 2025, he had provided "more than 50, but less than 100 emails" responsive to requests for production that were not produced as of June 30, 2025. ROC Nation's July 2nd production ended up being 400 pages of documents, a mere 5 days before the discovery cutoff.

These emails further demonstrate how Desiree Perez, Chief Executive Officer of Defendant ROC Nation, made decisions consistent as co-employer of Plaintiff: (1) ROC Nation splitting expenses with the Pete Defendants at Ms. Perez's direction covering costs (Exhibit "C"), and (b) personally and emphatically (with CAPS) ordered Plaintiff not be paid because she believed "hes [sic] billing us WRONG!!" (Exhibit "D").

Respectfully submitted,

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/s/ Ronald Zambrano

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